

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:14-cr- 93-LM
)	
ALKIS NAKOS)	
KOSMAS KOUSTAS)	
CHARLES FOWLE)	
JEREMY BLEVENS)	
CHRISTOPHER RANFOS)	
WILLIAM SWANSON)	
FRANK FOWLE)	
JOHN HORNE, JR.)	
_____)	

INDICTMENT

The Grand Jury charges:

COUNT ONE

[21 U.S.C. 848 - Continuing Criminal Enterprise]

From at least in or about 2008, up to and including June 2014, in the District of New Hampshire, the District of Massachusetts, the District of New York, the District of Vermont, and elsewhere, defendant,

ALKIS NAKOS,

knowingly, intentionally and unlawfully engaged in a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801 et seq., which were undertaken by defendant in concert with at least five other persons with respect to whom defendant occupied a position of organizer, supervisor, or manager, and from which defendant obtained substantial income and resources.

In violation of Title 21, United States Code, Section 848(a).

The Grand Jury charges:

COUNT TWO

[21 U.S.C. 846 – Conspiracy]

From at least in or about 2008, up to and including June 2014, in the District of New Hampshire, the District of Massachusetts, the District of New York, the District of Vermont, and elsewhere, defendants,

ALKIS NAKOS,
KOSMAS KOUSTAS,
CHARLES FOWLE,
JEREMY BLEVENS,
CHRISTOPHER RANFOS,
WILLIAM SWANSON,
FRANK FOWLE,
and,
JOHN HORNE, JR.,

knowingly, intentionally and unlawfully agreed and conspired together, and with others known and unknown to the grand jury, to distribute, and possess with intent to distribute, in excess of 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a schedule I controlled substance, and 3,4 methylenedioxymethamphetamine (MDMA), a/k/a Ecstasy, a/k/a Molly, a schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vii), and 846.

The Grand Jury further charges:

COUNT THREE

[21 U.S.C. 841 – Possession with Intent to Distribute Marijuana]

On or about March 30, 2014, in the District of New Hampshire, defendant,

KOSMAS KOUSAS,

knowingly, intentionally and unlawfully possessed marijuana, a schedule I controlled substance,
with the intention of distributing it.

In violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT FOUR

[21 U.S.C. 841 – Possession with Intent to Distribute
3,4 methylenedioxymethamphetamine (MDMA)]

On or about March 30, 2014, in the District of New Hampshire, defendant,

KOSMAS KOUSAS,

knowingly, intentionally and unlawfully possessed 3,4 methylenedioxymethamphetamine (MDMA), a/k/a Ecstasy, a/k/a Molly, a schedule I controlled substance, with the intention of distributing it.

In violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT FIVE

[18 U.S.C. 924 – Possession of a Firearm in Furtherance of a Drug Trafficking Crime]

On or about March 30, 2014, in the District of New Hampshire, defendant,

KOSMAS KOUSAS,

knowingly, intentionally and unlawfully possessed a Ruger P94 .40 caliber firearm, serial number 340-78726, and a Glock 30 .45 caliber firearm, serial number ETK617US, in furtherance of a drug trafficking crime as alleged in Counts Two, Three, and Four, all of which constitute crimes for which defendant may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

The Grand Jury further charges:

COUNT SIX

[18 U.S.C. 922 – Possession of a Firearm by a Convicted Felon]

On or about March 30, 2014, in the District of New Hampshire, defendant,

KOSMAS KOUSAS,

knowingly, intentionally and unlawfully possessed a firearm which had been transported in interstate or foreign commerce, to wit, a Glock 30 .45 caliber firearm, serial number ETK617US, after having been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL.

/s/ Foreperson
Grand Jury Foreperson

Dated: July 23, 2014

JOHN P. KACAVAS
United States Attorney

By: /s/ Terry L. Ollila
Terry L. Ollila
Assistant U.S. Attorney